

**Ohio Department of Education, Office for Exceptional Children  
2011-2012 Onsite Review Summary Report****Introduction**

The Ohio Department of Education's Office for Exceptional Children would like to extend appreciation to the district staff for their efforts, attention and time committed to the completion of the review processes.

The following report is a summary of the onsite review conducted on 10/17/11-10/21/11 by the Ohio Department of Education's Office for Exceptional Children (OEC) and Office of Early Learning and School Readiness as part of its general supervision requirements under the Individuals with Disabilities Education Act (IDEA) and Am. Sub. HB1. The onsite visit consisted of the following reviews:

- IDEA Review: (Special Education School Age, Special Education Early Childhood and Fiscal)
- Gifted Education Review

**IDEA Review****Overview**

Educational consultants from the Office for Exceptional Children (OEC) conducted IDEA review activities on 10/17/11-10/21/11 and 10/26/11. During the IDEA Review OEC consultants monitor the LEA's implementation of the IDEA to ensure compliance. The primary focus of the IDEA Review is to:

- Improve educational results and functional outcomes for all children with disabilities; and
- Ensure that LEAs meet program requirements under Part B of IDEA, particularly those requirements that are most closely related to improving educational results for children with disabilities.

OEC focused the review on the following areas:

- Child Find;
- Delivery of Services;
- Least Restrictive Environment;
- Data Verification.

**Data Sources**

During the review, OEC considered information from the following sources:

1. Public Parent Meeting, Individual Parent Meetings and Written Comments

On 10/4/11, South-Western City Schools mailed 2,657 OEC approved letters to all families with students with disabilities in the district. OEC provided the district with a public meeting announcement for inclusion on its website or newsletter. The district posted the information regarding the meeting 10/11/11 on their district website(s):

- <http://www.swcs.us/home/studentlearning/SpecialEducation.htm>
- <http://www.swcs.us/home/parentresources/ParentResources.htm>
- <https://www.facebook.com/SWCSD>

On 10/18/11, OEC consultants held a public meeting for parents and other interested parties. Public parent meeting dates for all districts selected for IDEA Reviews are posted on the ODE website. Nineteen parents, two SWCSD attendees, and one State Support Team (SST) Region 11 representatives attended the public meeting. Attendees could speak to OEC representatives publicly in the meeting or individually, provide written comments, or both. Eight parents made comments during the public meeting. Written comment forms were available before, during and after the meeting. OEC received three written comments. On the same day, the consultants held three individual parent/guardian meetings.

During the public meeting, parents were advised by OEC consultants of the formal complaint process under IDEA and that their public comments did not constitute a formal complaint. The participants were also informed that while the information they provided may be helpful to the review, it may not necessarily be acted upon as part of the review process. "Whose IDEA Is This?," Ohio's procedural safeguards notice, was available for participants who wanted a copy.

## 2. Pre-Onsite Data Analysis

OEC consultants reviewed district, building and grade level data. District data analyzed included the Special Education Performance Profile, Local Report Cards, and Education Management Information System (EMIS) data. The data analysis assists OEC in determining potential growth areas and district strengths.

## 3. Record Review

Between 10/17/11-10/21/11, OEC consultants reviewed 41 records of school age students with disabilities. An OELS&R consultant, on 10/20/11 reviewed eight records as part of the Early Childhood Special Education Review. OEC selected records of a variety of children with disabilities from eight buildings.

**Please note, not all records are reviewed for every component.**

## 4. Staff/Administrative Interviews

Between 10/19/11-10/20/11, OEC consultants held eight sessions of interviews with five administrators combined with a total of five school counselors, related services personnel and school psychologists. OEC interviews focused on the following review areas: Child Find; Delivery of Services; Least Restrictive Environment (LRE) and IEP alignment.

## **Findings**

A finding is made when noncompliance with a specific IDEA requirement is identified through the processes outlined above. All findings of noncompliance must be corrected as soon as possible, but no later than one year of the date of this report.

OEC provides separate written correspondence to the school district and the parent/guardian when action is required to correct findings of non-compliance for individual students.

Noncompliance that is identified in **30% or more** of the records reviewed by OEC and substantiated through other data sources must be included in a comprehensive corrective action plan (CAP) with action steps to address each of the noncompliance findings.

All noncompliance identified by OEC as part of the IDEA review, listed by subject area within this report in the *Review of Findings and District Required Actions* table, must be corrected as set forth below.

## Corrective Action Plan (CAP)

The *Review of Findings and District Required Actions* identifies the noncompliance which must be addressed in the corrective action plan developed by the South-Western City School District. An approved form for the corrective action plan will be provided by OEC or can be accessed on ODE's web site by using the keyword search "OEC Corrective Action Plan". The corrective action plan developed by the district must include the following:

- Improvement strategies to address all areas of identified non-compliance,
- Documentation/evidence of implementation of the strategies,
- Individuals responsible for implementing the strategies,
- Resources needed, and
- Completion dates.

State Performance Plan (SPP) results indicators may also be included in the corrective action plan to address improved performance for students with disabilities.

The district must submit the corrective action plan to Robyn Floyd, OEC Lead Consultant at [robyn.floyd@ode.state.oh.us](mailto:robyn.floyd@ode.state.oh.us) within 30 school days from the date of this report. OEC will review the action plan submitted by the district for approval. If OEC deems that a revision(s) is necessary, the district will be required to revise and resubmit. The district will be contacted by the OEC Lead Consultant and notified when the action plan has been approved.

**CAP Due Date: 02/21/2012**

### Individual Correction

The district has 60 school days of the issuance of the letter of findings to correct all identified findings of non-compliance for individual students, unless noted otherwise in the report.

**Individual Correction Due Date: 04/02/2012**

### Systemic Correction

The district must correct any noncompliant policies, procedures and/or practices identified through the onsite review. OEC will verify through follow-up review of new data that the noncompliant policies, procedures and/or practices have been revised and the district is correctly implementing the regulatory requirements of IDEA. The follow-up review of new data will include review of individual student records and may include parent/staff/administrative interviews, as needed.

**Systemic Correction Due Date: 01/08/2013**

For questions about specific components of this report please contact:

- **Special Education School Age:** Robyn Floyd, OEC Lead Consultant, at (614) 387-2204, toll-free at (877) 644-6338, or by e-mail at [robyn.floyd@ode.state.oh.us](mailto:robyn.floyd@ode.state.oh.us).
- **Special Education Early Childhood:** Edith Greer, Educational Consultant, at (330) 308-9939, or by e-mail at [Edith.Greer@ecoesc.org](mailto:Edith.Greer@ecoesc.org).
- **Fiscal:** Tom Main, Educational Consultant, at (614) 387-0156, toll-free at (877) 644-6338, or by e-mail at [tom.main@ode.state.oh.us](mailto:tom.main@ode.state.oh.us).
- **Gifted Education:** Michael Demczyk, Educational Consultant, at (614) 995-3354, toll-free at (877) 644-6338, or by e-mail at [michael.demczyk@ode.state.oh.us](mailto:michael.demczyk@ode.state.oh.us).

**Special Education School Age/Preschool Components, OEC's Review Findings, and District Required Actions**

**Component 1: Child Find**

*Each school district shall adopt and implement written policies and procedures approved by the Ohio Department of Education, Office for Exceptional Children, that ensure all children with disabilities residing within the district, regardless of the severity of their disability, and who are in need of special education and related services are identified, located, and evaluated as required by Individuals with Disabilities Education Improvement Act of 2004 and Federal Regulations at 34 C.F.R. Part 300 pertaining to child find, including the regulations at 34 C.F.R. 300.111 and 300.646 and Rule 3301-51-03 of the Operating Standards for Ohio Educational Agencies serving Children with Disabilities.*

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-1	300.303(b)(2)	<p><u>Record Review</u></p> <p>Two reevaluation record(s) indicated that the child's reevaluation was not completed within the three year timeline.</p>	<p><u>Individual Correction</u></p> <p>OEC has verified that these student(s) have a current ETR in place, so no additional individual correction is required.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding child find evaluation process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-2	300.305(a)	<u>Record Review</u> All preschool evaluation record(s) of children transitioning from Part C, utilized child information from the Individual Family Service Plan (IFSP) and other documentation provided by Help Me Grow in suspecting or when determining eligibility for Part B supports and services.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-3	OAC 3301-51-06 (2) and OAC 3301-51-06(4)	<u>Record Review</u> All school age initial evaluation(s) appropriately documented interventions provided to resolve concerns for the child performing below grade-level standards.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
CF-4	300.501(b)(1)	<u>Record Review</u> Fifteen school age record(s) did not show evidence that the evaluation planning team included the parent. All preschool records showed evidence that the parent were included.  <u>Interviews</u>  During each session staff members were asked specific questions directly related Child Find extended through the ETR to glean greater understanding from the record review question, "Did the evaluation team include the parent?"  Specifically the staff was asked to:  Describe how the district informs parents about the evaluation planning process and ensure parent participation in evaluation planning.  A combination of responses are as follows:  "Consent form, planning form, PR-01 to start	<u>Individual Correction</u>  The district must provide evidence that the parent was involved or provided the opportunity to participate (three documented attempts) in the evaluation planning process.  The evidence may include; evaluation planning form, prior written notice, parent invitation, referral form or communication log.  <u>Systemic Correction</u>  The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		evaluation, forms and procedures are on e-mail, district website, Depending on suspected disability – in most cases parents understand/ or aware of the issues; School psychologist and IAT team meeting where the parent is provided a vision of the students short and long term goals - teachers are part of the planning, through data and observation we determine what areas need to be tested; We contact parent through progress reports; Regular education teachers works the students; Regular education teachers have copies of IEP; Use tiered interventions; Receives support from parents; and at times, the ETR planning meeting drives the IEP - all staff members are involved to addresses any and all intervention that are tried.”		
CF-5	300.305(a)(1)	<p><u>Record Review</u></p> <p>Four school age evaluation(s) did not provide evidence that the evaluation planning team reviewed existing data on the child.</p> <p>All preschool evaluations provided evidence that the evaluation planning team reviewed existing data on the child.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting existing data was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review existing data during the evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-6	300.305(a)(2)	<p><u>Record Review</u></p> <p>Three school age evaluation did not provide evidence that the evaluation planning team identified what additional data, if any, were needed.</p>	<p><u>Individual Correction</u></p> <p>The district must provide the evaluation planning form or evidence documenting additional data, if any was reviewed during the evaluation planning process. If not, the IEP team must reconvene the ETR planning and ETR meeting.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to review additional data, if any during evaluation planning.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
CF-7	300.304(c)(4); OAC 3301-51-01; and OAC 3301-51-06	<p><u>Record Review</u></p> <p>One school age evaluation did not provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>All preschool evaluations covered all required domains.</p>	<p><u>Individual Correction</u></p> <p>The district will convene the ETR team to conduct a reevaluation and provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place to provide evidence that the evaluation addresses all areas related to the suspected disability.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-8	300.306(a)(1)	<p><u>Record Review</u> Three school age students did not show evidence that the parent of the child was involved in determining whether the child is a child with a disability.</p> <p>All preschool records showed evidence that the parents of the child were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u> The district must provide evidence that the parent was involved in determining whether the child is a child with a disability or evidence that the parent was provided the opportunity to participate in the eligibility determination as evidenced by three attempts to contact the parent. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of parent involvement.</p> <p><u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding the evaluation planning process to include the parent. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
CF-9	300.306(a)(1)	<p><u>Record Review</u> All school age and preschool students initial evaluation(s) showed evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u> None</p> <p><u>Systemic Correction</u> None</p>	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
CF-10	300.306(a)(1); 300.305(a); and 3301-51-01 (B)(21)	<p><u>Record Review</u></p> <p>Five preschool reevaluation(s) did not show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p> <p>All school age reevaluation(s) did show evidence that a group of qualified professionals as appropriate to the suspected disability were involved in determining whether the child is a child with a disability.</p>	<p><u>Individual Correction</u></p> <p>The district must provide evidence that the IEP team and other qualified professionals participated in the eligibility determination. If not, the IEP team must reconvene the ETR meeting and provide OEC evidence of group participation.</p> <p>IEP Team Members include, but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Parent</li> <li>2. Regular Education Teacher</li> <li>3. Special Education Provider</li> <li>4. District Representative</li> <li>5. An individual who can interpret the instructional implications of evaluation results,</li> <li>6. At the discretion of the parent or school district, other individuals who have knowledge or special expertise regarding the child, including related services personnel as appropriate;</li> <li>7. Whenever appropriate, the child with a disability.</li> </ol> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the eligibility determination process, <b>specifically for early childhood.</b></p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

**Component 2: Delivery of Services**

*Each school district shall have policies, procedures and practices to ensure that each child with a disability has an IEP that is developed, reviewed, and revised in a meeting and implemented in accordance with 300.320 through 300.324.*

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-1	300.320(a)(1)(i)	<p><u>Record Review</u></p> <p>Two school age student IEPs did not address how the child’s disability affects his/her involvement and progress in the general education curriculum.</p> <p>All preschool student IEPs addressed how the child’s disability affects his/her involvement and progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the two IEP(s) identified as noncompliant to review and amend the IEP to include a statement of how the child’s disability affects the child’s participation in appropriate activities to access, participate and progress in the general education curriculum.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the involvement and progress of children with disabilities in the general education curriculum and assessing how their disability affects that involvement.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-2	300.320(a)(1)	<p><u>Record Review</u></p> <p>Ten school age student IEP(s) did not contain Present Levels of Academic Achievement and Functional Performance (PLOP) that addressed the needs of the student.</p> <p><u>Interviews</u></p> <p>During each session, staff members were asked specific questions directly related to the Delivery of Services extended through the IEP to glean greater understanding from the record review question, “Does the IEP include Present Levels of Academic Achievement and Functional Performance (PLOP) that addresses the needs of the student?”</p> <p>Specifically the staff was asked to:</p> <p>“Describe how the district ensures that students with disabilities have access to the general curriculum and grade level content standards?”</p> <p>From the attended staff members’ responses, a general understanding for what was needed to be included in the PLOP was brought forward based on a sample of responses below:</p> <p><i>“Look at standards and integrate the functional activities to prepare the kid for real life; We provide accommodation and functional supports; Gross motor skills, we use token system for positive reinforcements for APE; We modify sports to accommodate the needs of the students; High expectations and meetings related to the IEP to show gains; Differentiating instruction; Modifications where applicable; All teachers have access to IEP – we have cheat-sheet to see the salient information; Look at standards and integrate the functional activities to prepare the kid for real life; We look at the IEP and PLOP based on baseline progress we make adjustments; Also use Rtl tiers and decide where the student’s levels - Rtl</i></p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the ten IEP(s) identified as noncompliant to review and amend the PLOP related to each goal to include:</p> <ul style="list-style-type: none"> <li>• A summary of current daily academic/behavior and/or functional performance (strengths and needs);</li> <li>• Baseline data provided for developing a measurable goal.</li> <li>• For preschool, the PLOP should relate to the child’s developmental domains, functional performance and pre-academic skills.</li> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the review of current academic/functional data when writing IEPs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
		<p><i>is for all students have access into the general curriculum, even those who are in the resources room; Helps screens behaviors and academic responsiveness; We use accommodations and modification to their functional levels but access the material; Look at standards and integrate the functional activities to prepare the kid for real life; We have team teaching approach in the same room, use tutoring as well; We have collaboration and common time planning; Sometime the parent does not want services; All IEPs are available for general teachers as well."</i></p> <p><u>Other Considerations</u></p> <p>Considering the fact that this is not an area to be addressed on the CAP, and a small sample of staff members responded to the interview question, please note that this was an additional outlier within the data collected. It would be a benefit to the district to consider incorporating a <i>Professional Development</i> aspect of the PLOP to ensure that all staff understands how to clearly state the students' present levels of academic achievement and functional performance.</p>		

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-3	300.320 (a)(2)(i)(A)	<p><u>Record Review</u></p> <p>One school age student (s) IEP did not contain annual goals that address the child's academic area(s) of need.</p> <p>All preschool student IEPs contained annual goals that address the child's academic area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include annual goals that address the academic needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified academic needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-4	300.320(a)(2)(i)(A)	<p><u>Record Review</u></p> <p>Two school age IEP(s) did not contain annual goals that address the child's functional area(s) of need.</p> <p>All preschool student IEPs contained annual goals that address the child's functional area(s) of need.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the two IEP(s) identified as noncompliant to review and amend the IEP to include annual goals that address the functional needs that were identified in the IEP or provide evidence that the IEP team, based on the severity of the needs of the child, decided to prioritize addressing the needs</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified functional needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-5	300.320(a)(2)(i)	<p><u>Record Review</u></p> <p>Thirteen school age and seven preschool IEP(s) did not contain measurable annual goals.</p> <p><u>Interviews</u></p> <p>During each session, staff members were asked specific questions directly related to the Delivery of Services extended through the IEP to glean greater understanding from the record review question, "Are annual goals stated in measurable terms?"</p> <p>Specifically the staff was asked to:</p> <p>Describe how the IEP team develops measurable IEP goals which contain:</p> <ol style="list-style-type: none"> <li>1. Specific behavior to measure,</li> <li>2. Specific conditions for measurement,</li> <li>3. Specific performance criteria?</li> </ol> <p>The following is an example of a staff member's response:</p> <p>"Both the regular education and special education classroom teachers discuss the goals together, based upon the standards. Every 6 weeks the regular education teacher gets a progress report on each kid with an IEP to determine if the goal is measurable, someone else reads it to see if it's understandable. It is important t to ensure that data can be gathered based upon how it's written. Goals have to be specifically written. In my lesson plans, I can identify the "how" to incorporate it into my planning."</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the twenty IEP(s) identified as noncompliant to review and amend annual goals to contain the following six critical elements:</p> <ol style="list-style-type: none"> <li>1. Who?</li> <li>2. Will Do What?</li> <li>3. To What Level of Degree?</li> <li>4. Under What Conditions?</li> <li>5. In What Length of Time?</li> <li>6. How Will Progress Be Measured?</li> </ol> <p><u>Systemic Correction</u></p> <p>The district must implement new procedures to ensure that annual goals written subsequent to this report will include the following six critical elements to demonstrate correction:</p> <ol style="list-style-type: none"> <li>1. Who?</li> <li>2. Will Do What?</li> <li>3. To What Level of Degree?</li> <li>4. Under What Conditions?</li> <li>5. In What Length of Time?</li> <li>6. How Will Progress Be Measured?</li> </ol> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-6	300.320(a)(4)	<p><u>Record Review</u></p> <p>Twenty one school age and eight preschool IEP(s) did not contain a statement of specially designed instruction that addresses the needs of the child and supports annual goals.</p> <p><u>Interviews</u></p> <p>During each session, staff members were asked specific questions directly related to the Delivery of Services extended through the IEP to glean greater understanding from the record review question, “Does the IEP contain a statement of specially designed instruction that addresses the need of the child and supports annual goals?”</p> <p>Specifically the staff was asked to:</p> <p>Describe how the IEP team determines the specially designed instruction to be provided i.e. instruction that is different from what other students receive in the regular education setting?</p> <p>A small sampling of feedback from the administrative staff was as follows:</p> <p>“We are consistently not doing this correctly...the link is within the ETR. We do a good job of matching the needs to the IEP, but we are not describing specifically what we are doing. We are doing the strategies, etc., but we are not documenting this on the IEP. We are not documenting what the general education teacher is doing. Our teams are consistently providing modifications and accommodations. We need to spell out clearly what we are doing. To improve will require training.”</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the twenty nine IEP(s) identified as noncompliant to review and amend the specially designed instruction to describe the adaption of, as appropriate to the needs of the child, the content, methodology, or delivery of instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining specially designed instruction.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p>A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-7	300.320(a)(7)	<p><u>Record Review</u></p> <p>Two school age IEP(s) did not indicate the location where the specially designed instruction will be provided.</p> <p>All preschool student IEPs contained the location where the specially designed instruction will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the two IEP(s) identified as noncompliant to review and amend the location where the specially designed instruction will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where specially designed instruction will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-8	300.320(a)(7)	<p><u>Record Review</u></p> <p>Two school age student IEP(s) did not indicate the amount of time and frequency of the specially designed instruction.</p> <p>All preschool student IEPs indicated the amount of time and frequency of the specially designed instruction.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the two IEP(s) identified as noncompliant to review and amend the amount of time and frequency of the specially designed instruction.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the amount and frequency of specially designed instruction to be provided.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-9	300.320(a)(4)	<p><u>Record Review</u></p> <p>Two school age IEP(s) did not identify related services that address the needs of the child and support the annual goals.</p> <p>All preschool student IEPs identified related services that address the needs of the child and support the annual goals.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the two IEP(s) identified as noncompliant to review and amend the IEP to include related services that were identified as needed in the IEP.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of addressing identified related service needs.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
DS-10	300.320(a)(7)	<p><u>Record Review</u></p> <p>One school age IEP did not indicate the location where the related services will be provided.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review and amend the IEP to include the location where the related services will be provided.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding the IEP process of determining the location where related services will occur.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DS-11	300.320(a)(7)	<u>Record Review</u> All school age and preschool IEP(s) did indicate the amount of time and frequency of the related services to be provided.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

### Component 3: Least Restrictive Environment (LRE) and IEP Alignment

Each school district shall ensure that to the maximum extent appropriate, children with disabilities, including children in public or nonpublic institutions or other care facilities, are educated with children who are nondisabled; and that a continuum of alternative placements is available to meet the needs of children with disabilities for special education and related services.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-1	300.324(a)(2)(v)	<u>Record Review</u> All school age and preschool IEP(s) did identify assistive technology to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-2	300.320(a)(6)(i)	<u>Record Review</u> All school age and preschool IEP(s) did identify accommodations provided to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-3	300.320(a)(4)	<u>Record Review</u> Five school age IEP(s) did not identify modifications to enable the child to be involved in and make progress in the general education curriculum.	<u>Individual Correction</u> The district must reconvene the IEP team(s) of the five IEP(s) identified as noncompliant to review the modifications that would alter the amount or complexity of materials or the performance expected of the child from grade level curriculum expectations and include them on the IEP.  <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding modifications.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> Yes A Corrective Action Plan is required due to meeting the 30% threshold of non-compliance.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-4	300.320(a)(4)	<p><u>Record Review</u></p> <p>One school age IEP did not identify supports for school personnel to enable the child to be involved in and make progress in the general education curriculum.</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team of the one IEP identified as noncompliant to review the supports for school personnel that were identified by the IEP team and define on the IEP the support, who will provide it and when the support will take place.</p> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding supports for school personnel.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-5	300.320(a)(5)	<p><u>Record Review</u></p> <p>Four school age IEP(s) did not include an explanation of the extent to which the child will not participate with nondisabled children in the regular education classroom.</p> <p>All preschool IEPs included, when applicable, the extent to which each child will not participate with nondisabled children in the regular education classroom</p>	<p><u>Individual Correction</u></p> <p>The district must reconvene the IEP team(s) of the four IEP(s) identified as noncompliant to review and include a justification for why the child was removed from the regular education classroom.</p> <p>The justification should:</p> <ul style="list-style-type: none"> <li>• Be based on the needs of the child, not the disability.</li> <li>• Reflect that the team has given adequate consideration to meeting the student's needs in the regular classroom with supplementary aids and services.</li> <li>• Document that the nature or severity of the disability is such that education in regular education classes, even with the use of supplementary aids and services, cannot be achieved satisfactorily.</li> <li>• Describe potential harmful effects to the child or others, if applicable.</li> </ul>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
			<u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding least restrictive environment placement decision process.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-6	300.321(1)	<u>Record Review</u> All school age and preschool IEP(s) did indicate that the IEP Team included a parent.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
LRE-7	300.321(2)	<u>Record Review</u> Two school age and one preschool IEP(s) did not indicate that the IEP Team included a regular education teacher.	<u>Individual Correction</u> For the three IEP(s) identified as noncompliant, the district must: <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the regular education teacher would not participate in the meeting, <b>and</b></li> <li>• Provide a written excuse signed by the parents and the district that allowed the regular education teacher not to be in attendance at the IEP meeting, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP will all required members present.</li> </ul> <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding regular education teacher involvement in the IEP process.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
LRE-8	300.321(3)	<p><u>Record Review</u></p> <p>One school age IEP did not indicate that the IEP Team included a special education teacher.</p>	<p><u>Individual Correction</u></p> <p>For the one IEP identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the special education teacher would not participate in the meeting, <b>and</b></li> <li>• Provide a written excuse signed by the parents and the district that allowed the special education teacher not to be in attendance at the IEP meeting, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP will all required members present.</li> </ul> <p><u>Systemic Correction</u></p> <p>The district must submit evidence to OEC of written procedures and practices in place regarding special education teacher involvement in the IEP process.</p> <p>OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.</p>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>
LRE-9	300.321(4)	<p><u>Record Review</u></p> <p>Two school age IEP did not indicate that the IEP Team included an LEA representative.</p>	<p><u>Individual Correction</u></p> <p>For the two IEP(s) identified as noncompliant, the district must:</p> <ul style="list-style-type: none"> <li>• Provide documentation that the parent was informed prior to the IEP meeting that the LEA representative would not participate in the meeting, <b>and</b></li> <li>• Provide a written excuse signed by the parents and the district that allowed the LEA representative not to be in attendance at the IEP meeting, <b>or</b></li> <li>• Reconvene the IEP team to review the IEP will all required members present.</li> </ul>	<p><input checked="" type="checkbox"/> No</p> <p>The district does <u>not</u> need to address this finding in a Corrective Action Plan.</p>

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
			<u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding LEA representative involvement in the IEP process.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	
LRE-10	300.321(5)	<u>Record Review</u> All school age and preschool student IEP(s) did indicate that the IEP Team included of a person qualified to interpret the instructional implications of evaluation results.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

#### Component 4: Data Verification

*Each school district shall report timely and accurate special education event records for students with disabilities; have in effect an Individualized Education program for each child with a disability with the LEA's jurisdiction and in place on or before Dec. 1, 2009; conduct initial evaluations within 60 days of receiving parental consent for evaluation; have an IEP in place for three-year olds transitioning from Early Intervention Programs on or before the child's third birthday; and have a secondary transition place in place that meets all required elements for IDEA.*

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-1	300.645 R.C. 3301.07.14	<u>Record Review</u> All school age and preschool IEP(s) indicated that the child had an IEP in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA
DV-2	300.645 R.C. 3301.07.14	<u>Record Review</u> One school age ETR indicated that the child did not have an ETR in effect as reported on the LEA's December 1, 2010 Child Count Report.	<u>Individual Correction</u> ODE will make the necessary adjustments to the districts IDEA allocations due to the fact the child count was overstated by one record(s). <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding data reporting. OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-3	SPP Indicator 20: Accurate and Timely Reporting of Special Education Event Record	<u>Record Review</u> Two school age and two preschool student records had inaccurate student data reported by the LEA through the Education Management Information System (EMIS) for the December 1, 2010 Child County Report, specifically in the following area(s): a) DOB b) IEP date (IIEP, RIEP, TIEP, CIEP, or FIEP events) c) ETR dates (IETR, RETR, TETR) d) Referral date e) Consent date f) Disability category as indicated as an outcome of ETR g) Admission date h) Withdrawal date i) Non-compliance reason for ETR or IEP date	<u>Individual Correction</u> The district must provide evidence that they corrected the student data through their Student Information System (SIS).  <u>Systemic Correction</u> The district must submit evidence to OEC of written procedures and practices in place regarding data reporting.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DV-4	SPP Indicator 11 300.301(c)(1)(i)	<u>Record Review</u> Indicator 11 not reviewed because the district did not report 100% compliance.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

Record Review Item	Regulation 34 CFR or OAC	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
			Required Actions	
DV-5	SPP Indicator 12 300.124	<u>Record Review</u> Three preschool IEP(s) did not show evidence that an IEP was in place for 3 year olds transitioning from Early Intervention Programs (0-3 years) on or before the child's third birthday.	<u>Individual Correction</u> The parents of the children affected by the district's action will be notified in writing that the child transitioning from Part C was entitled to Part B services beginning on the third birthday.  <u>Systemic Correction</u> The district will contact the SST early childhood coordinator to determine the appropriate personnel to participate in and successfully complete the "Connecting the Dots" webinar.  OEC will contact the district for submission of new records and review these records to determine compliance with this regulation.	<input checked="" type="checkbox"/> No The district does <u>not</u> need to address this finding in a Corrective Action Plan.
DV-6 A/B	SPP Indicator 20 for Secondary Transition Plans	<u>Record Review</u> Indicator 20 for Secondary Transition Plans not reviewed because the district did not report 100% compliance for Indicator 13.	<u>Individual Correction</u> None  <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

## Gifted Education Review

A gifted education review to ensure compliance with state law and state *Operating Standards for Identifying and Serving Gifted Students* was conducted on October 19, 2011.

Eight gifted education components were addressed during the onsite review. Each component is detailed below, including a description of evidence provided and reviewed and corrective action required to resolve any issues of non-compliance.

### Gifted Components, OEC's Review Findings, and District Required Actions

#### Component 1: Gifted Budget

*Based on Am. Sub. HB 1, did the district spend for services to identified gifted students at least the same amount of state funding that it received in fiscal year 2009 through unit funding? In addition, did districts that in fiscal year 2009 received gifted student services from an ESC – and the ESC received gifted unit funding in fiscal year 2009 – either (a) obtain gifted student services from an ESC that are comparable to the gifted student services provided to the district with gifted unit funding in fiscal year 2009 by an ESC or (b) spend for services to identified gifted students from the funds received through the EBM an amount not less than the amount of gifted unit funding expended by an ESC in fiscal year 2009 for the district's students?*

Citation	Evidence of Findings	Evidence of Correction	
		Required Actions	Must be addressed in CAP
ORC 3306.09(G)	OEC reviewed district spending related to gifted education. Evidence was provided to demonstrate that fiscal year 2011 gifted spending was equal to or more than fiscal year 2009 unit funding.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  None	<input checked="" type="checkbox"/> NA

**Component 2: Roster and Written Education Plans and Attestation**

*Per Ohio Administrative Code 3301-51-15 (D)(4), does the district have a current written education plan (WEP) for each student reported as served? Does each WEP include the following components?*

- *Goals for the students for each service to be provided;*
- *Specified methods for evaluating progress toward goals;*
- *Method and schedule for reporting progress to parents;*
- *Staff responsible for ensuring delivery of each service prescribed;*
- *Policies regarding waiver of assignments and rescheduling of tests;*
- *Deadline for next review of WEP; and*
- *Copy of WEP to parents and staff responsible for providing service listed?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>OAC 3301-51-15(D)(4)</b>	WEPs for nine students were provided and reviewed. All WEPs included all of the required components. One WEP selected for review was not provided due to that SSID being provided by the district in error. The district explained that SSIDs from last year had not yet been updated to reflect the current year at the time of selection.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 3: Equitable Services and Attestation**

Are all district students who meet the written criteria for a gifted service provided an equal opportunity to receive that service? Each gifted service offered in the district must be available to all eligible students in each building in the district at that grade level.

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>ORC 3324.06(D)</b>	Each gifted service offered in the district is available to all eligible students in each building in the district at that grade level. Services are available to all eligible students.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 4: Acceleration and Attestation**

Did the district provide evidence that they are implementing their acceleration policy?

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>ORC 3324.10</b>	A WAP was provided for whole grade acceleration, subject acceleration and early graduation. No WAP was provided for early entrance. Students are afforded the opportunity to be evaluated for early entrance. However, the requirements for early entrance specified in the district's Entrance Requirements (Policy 5112) do not align with the evaluation process specified in the district's Policy on Academic Acceleration, Early Entrance to Kindergarten and Early Graduation (Policy 5409).	<u>Individual Correction</u> N/A <u>Systemic Correction</u> The district must describe in the corrective action plan a process for updating its early entrance requirements (5112) to align with its acceleration policy (5409).	<input checked="" type="checkbox"/> Yes

**Component 5: Gifted Intervention Specialists and Attestation**

*Do gifted intervention specialists (GIS) spend at least 75 percent of their time providing instruction directly to gifted students? Is the remainder of their time spent on other duties related to gifted education?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>OAC 3301-51-15(E)(2)</b>	Documentation was provided that verified district compliance. All requirements regarding percentage of time providing direct instruction and having other duties related to gifted education were met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 6: Licensure Attestation**

*Do all staff members assigned as gifted coordinators or GIS have gifted licensure, gifted endorsement or a gifted supplemental license?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
<b>OAC 3301-51-15(E)(3), OAC 3301-51-15(E)(6)</b>	Copies of licenses for the gifted coordinator and the GISs were provided for review. Staff members hold the appropriate licensure or endorsement for the position of gifted coordinator and/or GIS.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 7: Requirement for Minutes of Service Attestation**

*Are all students receiving service from a GIS receiving at least 225 minutes of instruction per week (kindergarten through grade 5) or 240 minutes of instruction per week (grades 6-12) from the GIS?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(E)	The district attested that this requirement has been met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Component 8: Requirement for Regular Education Teacher Professional Development**

*Are all general education teachers providing gifted services receiving professional development in teaching gifted students and ongoing assistance with curriculum development and instruction from a gifted specialist and is curriculum related to gifted services differentiated?*

Citation	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
OAC 3301-51-15(D)(3)(b)(i)	The district attested that this requirement has been met.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

**Fiscal Components, OEC’s Review Findings, and District Required Actions**

**Component 1: Statement of Accounts**

*District/School has submitted its FY11 IDEA Part B Regular (fund 516) and Pre-School (fund 587) ARRA FERs in the CCIP. The Financial Detail (FINDET) report and Accounting Report (ACCRPT) for those funds and the Final Expenditure Reports are consistent and in agreement. The District/School has provided copies of their FY12 IDEA Part B FINDET and ACCRPTs for the two funds. The reports show that expenditures for each fund to date are in line with the FY12 budget in the CCIP. The fiscal reports are evidence that ensure that district children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	District/School has submitted its FY11 IDEA Part B Regular (fund 516) and Pre-School (fund 587) ARRA FERs in the CCIP. The Financial Detail (FINDET) report and Accounting Report (ACCRPT) for those funds and the Final Expenditure Reports are consistent and in agreement. The District/School has provided copies of their FY12 IDEA Part B FINDET and ACCRPTs for the two funds. The reports show that expenditures for each fund to date are in line with the FY12 budget in the CCIP.	<u>Individual Correction</u> None <u>Systemic Correction</u> None	<input checked="" type="checkbox"/> NA

## Component 2: Payroll Expenditures

*District/School is able to document that the federal funds were expended for an appropriate purpose; payroll expenditures are supported by Time and Effort Logs or Semi-Annual Certification; expense were properly coded to the correct function and object code; all staff in certified positions have appropriate licensure; all funded positions have position descriptions; districts ACCRPT and FER are in agreement.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	District/School is able to document that the federal funds were expended for an appropriate purpose; payroll expenditures are supported by Time and Effort Logs or Semi-Annual Certification; expense were properly coded to the correct function and object code; all staff but one had current certifications in certified positions have appropriate licensure; all funded positions have position descriptions; districts ACCRPT and FER are in agreement.	<u>Individual Correction</u>  Provide current certification for the staff member that you were contacted about or provide an explanation that includes a remedy of this situation that is included in a policy. Please note the district must ensure all staff maintains current appropriate licensure.  <u>Systemic Correction</u>  None	<input checked="" type="checkbox"/> No

## Component 3: Non-Payroll Expenditures

*District/School is able to document that the federal funds were expended for an appropriate purpose and reasonable for the program; that fiscal coding is appropriate and the funds were charged to the proper fund, function and object; that the district is able to document the expenditure with a purchase order, receipt statement or invoice.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	District/School is able to document that the federal funds were expended for an appropriate purpose and reasonable for the program; that fiscal coding is appropriate and the funds were charged to the proper fund, function and object; that the district is able to document the expenditure with a purchase order, receipt statement or invoice.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  None	<input checked="" type="checkbox"/> NA

**Component 4: Use of funds for Capital Outlay and equipment purchase**

*District/school expended funds for Capital Outlay and/or equipment. The district/school evidences that it has followed the board adopted procurement policy. The district must ensure that equipment and supplies placed in the non-public school are used for Part B purposes only and can be removed from the non-public school without remodeling the school facility.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	District/school expended funds for Capital Outlay and/or equipment. The district/school evidences that it has followed the board adopted procurement policy. The district must ensure that equipment and supplies placed in the non-public school are used for Part B purposes only and can be removed from the non-public school without remodeling the school facility.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  None	<input checked="" type="checkbox"/> NA

**Component 5: Equipment inventory policy and procedures**

*The district/school retains control and administration of funds used to purchase materials, equipment and property purchased with those funds for the uses and purpose provided in the IDEA. The district is properly identifying equipment purchased with IDEA funds and is complying with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was updated within the last two years; the district has a equipment disposal policy; The district requested disposition instructions from ODE prior to disposing of assets with at fair market value of more than \$5,000.00, and sale proceeds were deposited back into the original grant.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.202	The district/school retains control and administration of funds used to purchase materials, equipment and property purchased with those funds for the uses and purpose provided in the IDEA. The district failed to properly identify some of the equipment purchased with IDEA funds and did not comply with Board Policy in cataloguing and inventorying the equipment. The district master list of equipment purchased with IDEA funds was not updated; the district has a equipment disposal policy; The district requested disposition instructions from ODE prior to disposing of assets with at fair market value of more than \$5,000.00, and sale proceeds were deposited back into the original grant.	<p><u>Individual Correction</u></p> <p>Follow your board policy for all items on your inventory list. Specifically see that they are tagged.</p> <p><u>Systemic Correction</u></p> <p>Please provide further written policies that will ensure your board policy is followed.</p>	<input checked="" type="checkbox"/> Yes

**Component 6: Non-Public Count and Proportionate Share**

*The District provides child find and ensures equitable participation. The district maintains in its records and provides to the SEA the following information related to parentally-placed private school children covered under 34 CFR 300.130 through 300.144: the number of children evaluated; the number of children determined to be children with disabilities; and the number of children served.*

*The district has timely and meaningful consultation with representatives of parentally-placed private school children with disabilities (consistent with 34 CFR 300.134); conducts a thorough and complete child find process to determine the number of parentally-placed private school children with disabilities attending private schools located in the school district.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.130 through 300.144	<p>The District provides child find and ensures equitable participation. The district maintains in its records and provides to the SEA the following information related to parentally-placed private school children covered under 34 CFR 300.130 through 300.144: the number of children evaluated; the number of children determined to be children with disabilities; and the number of children served.</p> <p>The district has timely and meaningful consultation with representatives of parentally-placed private school children with disabilities (consistent with 34 CFR 300.134); conducts a thorough and complete child find process to determine the number of parentally-placed private school children with disabilities attending private schools located in the school district.</p>	<p><u>Individual Correction</u></p> <p>None</p> <p><u>Systemic Correction</u></p> <p>None</p>	<input checked="" type="checkbox"/> NA

**Component 7: Notification of Public Participation**

*In accordance with 34 CFR 300.165, the district/school provided a public hearing, adequate notice of the hearings and an opportunity for comment available to the general public including individuals with disabilities and parents of children with disabilities in planning the use of IDEA Part B funds.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.165 and Part 300.201	In accordance with 34 CFR 300.165, the district/school provided a public hearing, adequate notice of the hearings and an opportunity for comment available to the general public including individuals with disabilities and parents of children with disabilities in planning the use of IDEA Part B funds.	<u>Individual Correction</u>  None  <u>Systemic Correction</u>  None	<input checked="" type="checkbox"/> NA

**Component 8: Redirection of funds**

*The district/school has redirected funds for CEIS and is able to document the expenditures related to CEIS, validate that the percent of the IDEA funds used for CIES is 15% or less of total allocation, document the number of students who were served and are able to track and report on the number of students who subsequently received special education services.*

*The district/school reduced its local expenditures by no more than 1/2 of its additional allocation amount and can document the expenditures/reduction and the amount is shown in the CCIP.*

Regulation 34 CFR	Evidence of Findings	Evidence of Correction	Must be addressed in CAP
		Required Actions	
300.205	Not applicable	Not applicable	<input checked="" type="checkbox"/> NA